

**Presentment Date: May 14, 2013 at 12:00 P.M. (prevailing Eastern Time)**

**Objection Deadline: May 13, 2013 at 4:00 P.M. (prevailing Eastern Time)**

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of Junior Secured Noteholders

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	
	)	Case No. 12-12020 (MG)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF PRESENTMENT OF THE APPLICATION OF THE AD HOC GROUP OF  
JUNIOR SECURED NOTEHOLDERS PURSUANT TO SECTION 107(b) OF THE  
BANKRUPTCY CODE, BANKRUPTCY RULE 9018, AND CASE MANAGEMENT  
ORDER FOR AN ORDER AUTHORIZING IT TO FILE UNDER SEAL (A) AN  
UNREDACTED COPY OF THE AD HOC GROUP'S SUPPLEMENTAL OBJECTION  
TO DEBTORS' MOTION FOR ENTRY OF AN ORDER TO PERMIT DEBTORS TO  
CONTINUE USING CASH COLLATERAL AND (B) UNREDACTED SUPPORTING  
EXHIBITS**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. Upon the annexed application (the "Application") of the Ad Hoc Group of Junior Secured Noteholders (the "Ad Hoc Group"), for entry of an order authorizing the Ad Hoc Group to file under seal (a) an unredacted copy of the Ad Hoc Group's Supplemental Objection to Debtors' Motion for Entry of an Order to Permit Debtors to Continue Using Cash Collateral and (b) Supporting Exhibits, the undersigned will present a proposed order (the "Proposed Order") approving the Application, substantially in the form attached to the Application as Exhibit A, to

the Honorable Martin Glenn, United States Bankruptcy Judge, Room 501 of the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, for signature on May 14, 2013 at 12:00 p.m. (prevailing Eastern Time).

2. Any objections to the Proposed Order must be made in writing (an “Objection”), filed with the Court (with a copy to Chambers) and served in accordance with the Order Under Bankruptcy Code Sections 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 141] (the “Case Management Order”), and served upon the Special Service List, as that term is defined in the Case Management Order, so as to be actually received no later than May 13, 2013 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).
3. If no Objections to the Application are timely filed and served on or before the Objection Deadline, the Court may enter the Proposed Order with no further notice or opportunity to be heard offered to any party. If an Objection is received in accordance with the terms above, the Court will schedule a hearing with respect to the relief sought in the Application.
4. A Copy of the Application can be obtained or viewed for a fee via PACER at [www.pacer.gov](http://www.pacer.gov) or (without charge) on the Debtors’ restructuring website at [www.kccllc.net/rescap](http://www.kccllc.net/rescap).

Dated: May 11, 2013  
New York, New York

Respectfully submitted,

By: /s/ J. Christopher Shore  
J. Christopher Shore

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